

#### REMARKS

In response to the Office Action dated June 23, 2006, Applicants request Continued Examination (RCE) under 37 C.F.R. § 1.114 of the above-identified application. Claims 1-35 have been canceled and new claims 36-61 have been added. Claims 36-61 are pending in the application.

In paragraph 4 on page 2 of the Office Action, claims 1-35 were rejected under 35 U.S.C. § 102(b) as being anticipated by or, in the alternative under 35 U.S.C. § 103(a) as obvious over Krum et al.

Applicants respectfully traverse the rejections, but in the interest of expediting prosecution have canceled claims 1-35.

Krum et al. teach a chassis for holding a plurality of hard disk. The chassis includes a RAID controller to provide logical addresses for the plurality of hard disk provided by the hard disk carriers.

However, Krum et al. fail to suggest a hard disk carrier housing holding a plurality of hard disk storage devices that is configured for insertion in a disk array chassis. Krum et al. merely shows a chassis that allows individual disk drives to be inserted or removed.

Krum et al. also fail to suggest a hard disk carrier access device for structuring access to physical addresses of the multiple hard disk storage devices within the hard disk carrier housing and providing access to each of the multiple hard disk storage devices over one connection. Krum et al. discloses a system level controller that aggregates the addresses of the drives in the chassis. Krum et al. does even mention providing multiple hard disk storage devices within a single hard disk carrier housing that is configured for insertion in a chassis. Krum does not even contemplate the need for a hard disk carrier access device for structuring access to physical addresses of the multiple hard disk storage devices within the hard disk carrier housing.

Moreover, because only provides a chassis for holding carrier housing that contain only a single hard disk storage device, Krum et al. can only provide RAID configuration at the system level (chassis level). The RAID controller 30 of Krum et al. is connected to a host interface bus. Thus, the RAID controller 30 only provides system level RAID configuration. In contrast, invention as recited in the claims of the present application provides both system level RAID and package level RAID.

Accordingly, Krum et al. fail to disclose, teach or suggest the invention as described in the new claims.

On the basis of the above amendments and remarks, it is respectfully submitted that the claims are in immediate condition for allowance. Accordingly, reconsideration of this application and its allowance are requested.

If a telephone conference would be helpful in resolving any issues concerning this communication, please contact Attorney for Applicant, David W. Lynch, at 423-757-0264.

Respectfully submitted,

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